

Comments from ITI Regarding Electronic Approaches to the Notification and Movement Documents November 30, 2020

The Information Technology Industry Council (ITI) appreciates the opportunity to submit these comments on the Report on experiences, at the national and international levels, in developing and implementing electronic systems for exchanging information on or controlling the movements of goods and wastes, and lessons learned from such experiences (Annex to UNEP/CHW/OEWG.12/INF/18) (Report).

ITI supports the ongoing efforts to evaluate electronic approaches to notification and movement documents required under the Basel Convention. At present, the prior notice and consent system required under the Basel Convention is often inefficient and administratively burdensome. As countries take steps to advance a more circular economy, Parties should work to improve the overall prior informed consent (PIC) process. ITI encourages the Parties to explore opportunities to modernize and improve the notification and related movement documentation required for the transboundary movement of wastes covered by the Convention. Such improvements will be necessary to ensure the consistent, transparent and efficient operation of the PIC system – improvements that will be critical to expanding the circular economy.

In particular, we encourage the Parties to explore further:

- The use of a “single window” approach to standardize and expedite notice, consent and movement documentation.
- Opportunities for systems and data harmonization that will enable Parties and private sector actors to prepare and share information on a common communications platform.
- The benefits of developing electronic information sharing systems that initially seek to facilitate the prompt and transparent movement of priority waste streams to ensure environmentally sound management (e.g., electronic wastes).
- The development of regional pilots for new electronic notification approaches, in collaboration with Parties, BC Regional Centers, and actors typically involved in notifications and information processing.
- The formation of a work group under the Convention to further the development and use of electronic approaches to notification and movement documents.

The Report highlights important work already undertaken by the Parties and stakeholders to pursue electronic approaches to the notification and movement documents. As detailed in the Report, several Parties, regional groups, and international groups have already built up experience developing and implementing e-notification programs that can and should inform the development of e-notification systems for compliance with the Basel Convention. There are important lessons to be learned from these initiatives, and we appreciate the Secretariat’s efforts to capture those lessons and experiences in the Report.

The Report also incorporates the important work that the Secretariat has conducted on this topic at the Parties’ direction. In 2018, the Secretariat compiled and summarized Parties’ responses to a questionnaire on electronic approaches to the notification and movement documents. See UNEP/CHW/OEWG.11/INF/21. Following the request in Decision BC-14/11, the Secretariat accepted comments from the Parties, conducted interviews, and researched online to prepare the Report, which

includes helpful lessons learned. As the Report demonstrates, there are a number of existing initiatives that the Parties can learn from and build on.

We support the continued review of the existing initiatives and investments in facilitating e-notification under the Basel Convention, and we recognize the importance of this work by the Secretariat and the Parties. As Parties consider revisions to the Convention's annexes, this work takes on increased importance and urgency in order to facilitate shipments of any newly controlled wastes. Developing and embracing e-notification processes for Basel Convention notifications would enable Parties and stakeholders to more easily and transparently implement Basel Convention requirements. As such processes are adopted, the Parties must also allow sufficient time and flexibility for stakeholders, including multi-national companies shipping controlled waste, to undertake the significant change management and systems implementation required to operationalize new electronic processes. The significance and scope of the changes needed will depend, in part, on technical details (e.g., the compatibility of the proposed electronic systems with existing software and operating systems), the data model used as a baseline, the information required to be newly digitized by companies, and the availability of support and resources (like a table linking HTS codes to waste identification codes).

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